

IN THE CIRCUIT COURT OF
BARBOUR COUNTY, ALABAMA
EUFULA DIVISION

ARMA JEAN HARRIS,

Plaintiff,

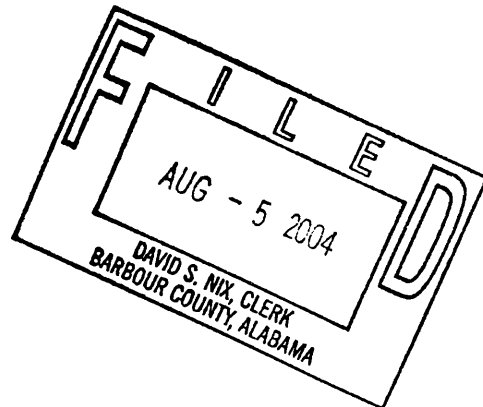
vs.

BEAULIEU GROUP, LLC and
FICTITIOUS DEFENDANTS A, B,
and C, being those persons, corporations,
or other legal entities whose actions as
described herein caused damage to the
Plaintiff, and whose identities are
unknown to the Plaintiff at this time,

Defendants.

CASE NO. CV-04-

147

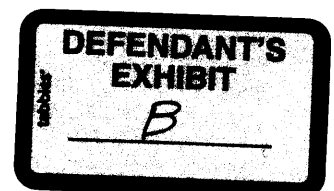


COMPLAINT

COMES NOW the Plaintiff in the above styled matter, by and through counsel,
and hereby submits this Complaint at law against the Defendant, and as grounds therefor
shows unto the Court as follows:

STATEMENT OF THE PARTIES

1. Plaintiff, Arma Jean Harris, is over the age of nineteen (19) years and is a resident citizen of Barbour County, Alabama.
2. Defendant, Beaulieu Group, LLC (hereinafter "Beaulieu") is a foreign corporation licensed to do business in Barbour County, Alabama.
3. Fictitious Defendants "A", "B" and "C" are those persons, corporations, partnerships or other legal entities whose identities are unknown to the Plaintiffs at this time but who will be supplemented as party Defendants by amendment upon Plaintiffs' discovery of said identities.



4. Plaintiff brings this action pursuant to the Alabama Worker's Compensation Statutes, § 25-5-1, et. seq., Alabama Code 1975.

COUNT ONE
WORKER'S COMPENSATION

5. Plaintiff began her employment with Defendant Beaulieu Group, LLC (also known as Beaulieu of America) in 1986 and at the time of her accident was employed as a winder operator.
6. On June 1, 2003, Plaintiff was working within the line and scope of her employment with the Defendant when part of an air conditioning cover, duct work, debris and water fell over fifty (50) feet onto her head and neck. As a result of this work-related injury, Plaintiff was taken to Lakeview Community Hospital by her supervisor for treatment.
7. Shortly thereafter, Plaintiff was taken from Lakeview Community Hospital to Flowers Hospital in Dothan, Alabama, where she was diagnosed with a severe head injury.
8. Plaintiff subsequently treated with First Med of Dothan complaining of back and neck pain, as well as pressure in her eyes. She was diagnosed with blunt force trauma to the head and neck and was admitted to Southeast Alabama Medical Center on June 4, 2003 for observation.
9. While at Southeast Alabama Medical Center, Plaintiff underwent several x-rays, CT scans and MRI tests. After said tests had been performed, Plaintiff was diagnosed with post concussion syndrome with amnesia.
10. Plaintiff has continued to experience problems with her head and neck and has received treatment for same from several physicians.

11. As a result of her injuries, Plaintiff was and is unable to perform the everyday functions of her job. Due to extreme headaches, blurred vision, and memory loss, Plaintiff has been unable to return to work and has been required by the Defendant to use her leave time in order to be off work.
12. On April 28, 2004, Plaintiff received a letter from Brenda Dease, Human Resource Representative, which stated that she had utilized her maximum leave time and that her active employment status with Beualieu would end effective April 29, 2004.
13. Defendant's Worker's Compensation Carrier, Kemper Services, sent Plaintiff a check on October 31, 2003, but has made no contact with her since that time.
14. Since October 31, 2003, Defendant Beaulieu Group, LLC, has refused to pay any Worker's Compensation benefits or any other benefits to Plaintiff to which she is entitled.

WHEREFORE, Plaintiff demands all medical and total temporary disability payments, as well as any permanent partial and/or permanent total disability benefits to which Plaintiff would be entitled for Defendant's unlawful refusal to pay worker's compensation coverage under the Alabama Worker's Compensation statute.


Respectfully submitted this the 2nd day of ~~July~~^{August}, 2004.

Arma J. Harris
ARMA HARRIS

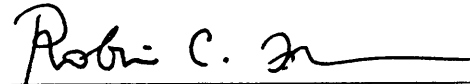
STATE OF ALABAMA)

COUNTY OF HOUSTON)

Before me, the undersigned authority, personally appeared Arma Harris, who being duly sworn by me, deposes and says that she has read the foregoing, that she understands the same, and that the facts contained therein are true and correct to the best of her information, knowledge and belief.


NOTARY PUBLIC
My Commission Expires: 7-29-08


M. ADAM JONES (JON-126)
Attorney for Plaintiff


ROBIN C. FREEMAN (FRE-050)
Attorney for Plaintiff

OF COUNSEL:
HALL, SMITH & JONES
P.O. Box 1748
Dothan, AL 36302-1748
334-793-3610
FAX 334-671-1843

SERVE DEFENDANT AT:

Beualieu Group, LLC
c/o The Corporation Company
60 Commerce Street
Montgomery, Alabama 36104